

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>IN RE: SKS CONSTRUCTION, INC.</b>	)	<b>Case No. 21-31862-KLP</b>
	)	
<b>Debtor.</b>	)	<b>Chapter 11</b>
	)	
<hr/>		
<b>SKS CONSTRUCTION, INC.</b>	)	
	)	
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>Adversary Proceeding</b>
	)	<b>No. 21-03097-KLP</b>
<b>GARDNER STATION, LLC</b>	)	
	)	
<b>Defendant.</b>	)	
	)	
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**DECLARATION OF DAVID G. BROWNE REGARDING ATTORNEY'S FEES**

1. My name is David G. Browne, I am over the age of 18 years, I understand the meaning and obligation of an oath, and I declare the following under penalty of perjury based upon my personal knowledge.

2. I am an attorney employed by Spiro & Browne, PLC, and at all times relevant hereto have been licensed to practice law in the Commonwealth of Virginia and admitted to practice before the United States District and Bankruptcy Courts for the Eastern District of Virginia.

3. I represent the Debtor/Plaintiff in the above-styled adversary proceeding.

4. My billing rate at all times relevant was \$350.00 per hour in this case, as approved by the Bankruptcy Court in the Debtor's Application to Employ Spiro & Browne as counsel.


5. I spent a total of 8.0 hours of billable time in connection with the Motion for Protective Order for which SKS seeks payment of fees.

6. This work is further detailed, described, and documented in the draft invoice record attached hereto and made a part hereof as Exhibit A, and is based upon time records created at or near the time of the work performed.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 30, 2022

Richmond, Virginia



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David G. Browne

# EXHIBIT A



Spiro & Browne, PLC  
804-573-9220

2400 Old Brick Road  
Glen Allen, Virginia  
23060  
United States

Billed To

SKS Construction, Inc.

Date of Issue

03/30/2022

Due Date

Invoice Number

Amount Due (USD)

**\$2,800.00**

Description	Rate	Qty	Line Total
Time (Gardner Station AP) David Browne – Mar 25, 2022 Receipt and review of notice of corporate deposition of SKS from defense counsel; review of applicable rules and case law on reasonableness of notice, scope of proposed deposition, and other grounds for objection or protective order, need for protective order	\$350.00	1.2	\$420.00
General (Gardner Station AP) David Browne – Mar 27, 2022 Draft motion for protective order on deposition notice and discovery requests, motion to expedite, select and prepare exhibits, and file motion	\$350.00	4.6	\$1,610.00
General (Gardner Station AP) David Browne – Mar 27, 2022 Review of applicable rules, e-mail to Gardner Station counsel regarding his objectionable corporate deposition notice and intent to file motion for protective order	\$350.00	0.4	\$140.00
General (Gardner Station AP) David Browne – Mar 30, 2022 Draft and submit proposed order on protective order motion	\$350.00	0.5	\$175.00
General (Gardner Station AP) David Browne – Mar 30, 2022 Appear at hearing on Motion for Protective Order	\$350.00	0.5	\$175.00
General (Gardner Station AP) David Browne – Mar 30, 2022 Prepare for hearing on motion for protective order	\$350.00	0.8	\$280.00
Subtotal			2,800.00

Tax	0.00
Total	2,800.00
Amount Paid	0.00
Amount Due (USD)	\$2,800.00